

1 part of my responsibility as working with TBN. So, he did
2 need to be specific in what he was talking about. In this
3 letter, he's referring to applications that were filed by TBN.

4 Q So, TBN was filing applications for translators?

5 A Yes. TBN had filed for translator applications
6 prior to Translator being formed. Denver was one and there
7 was -- Denver was the, the test case, I believe.

8 Q What was your role with regard to the preparation
9 and filing and oversight of the TBN applications?

10 A At this particular time, I was -- let's see,
11 November '80. I probably was just getting involved with
12 working in this area because Mr. Hickey, who had formerly been
13 Mr. Crouch's assistant, had -- I think he had just left, and
14 so I took over the responsibilities of interfacing with the
15 FCC attorneys and doing all the applications at that particu-
16 lar time.

17 Q So, you essentially had complete oversight of all of
18 TBN's applications?

19 A For the most part, yes.

20 Q As well as Translator TV, Inc.'s application?

21 A Right.

22 Q Can you explain why Mr. Dunne would write to you in
23 your capacity at Trinity Broadcasting Network about a matter
24 relating to Translator TV, Inc.?

25 A He knew where I was.

1 Q Why wouldn't he write to you at Translator TV, Inc.?

2 A Well, he knew that I was at Trinity Broadcasting
3 Network. That's where my office was and that was my address.

4 JUDGE CHACHKIN: This was also the address of
5 Translator, was it not?

6 MRS. DUFF: That's where I was, so that's -- you
7 know, what else could I do? I was there. I wasn't someplace
8 else.

9 JUDGE CHACHKIN: But it --

10 MRS. DUFF: I mean --

11 JUDGE CHACHKIN: -- it's not addressed to Translator
12 TV, Inc. It's addressed to Trinity Broadcasting Network, Inc.
13 The question is why would he address you with that -- at that
14 location -- not at that location, but that designation rather
15 than Translator TV, Inc., if this letter refers -- pertains to
16 Translator TV, Inc.?

17 MRS. DUFF: Well, everything in the letter didn't
18 pertain to Translator, I don't believe, in this particular
19 letter, but I don't know why Mr. Dunne would do that. I mean,
20 I don't know -- I couldn't answer for him.

21 JUDGE CHACHKIN: All right.

22 BY MR. SCHONMAN:

23 Q Mrs. Duff, at page 24 of your direct testimony,
24 paragraph 34, you state that pursuant to the FCC's low-powered
25 television proposal, NMTV began preparing and filing

1 applications.

2 A Okay. Where --

3 Q If you'd like to take a look at that, your direct
4 testimony --

5 MR. COHEN: What page number?

6 MR. SCHONMAN: Page 24. You might want -- she has
7 the wrong one. That would be Trinity Exhibit 101.

8 COURT REPORTER: Excuse me.

9 MRS. DUFF: What page --

10 COURT REPORTER: Excuse me.

11 JUDGE CHACHKIN: Do you want to go off the record?

12 MR. SCHONMAN: 24. Okay. You can look at it while
13 we're off, while we're off the record.

14 (Off the record.)

15 (On the record.)

16 JUDGE CHACHKIN: Finished reading what the Court
17 set?

18 MRS. DUFF: Yes.

19 JUDGE CHACHKIN: All right. Then go ahead, Mr.
20 Schonman.

21 BY MR. SCHONMAN:

22 Q My question for you, Mrs. Duff, is who was involved,
23 first of all, in preparing Translator TV, Inc.'s applications?

24 A It would have been done at my direction. I had a
25 staff and I relied upon an engineer, consulting engineer, to

1 prepare the engineering, to assist in locating sites. I
2 located some of the sites myself. And I relied on, at this
3 time, Gammon and Grange as our FCC attorneys.

4 Q All right. You indicated that you relied on your
5 staff.

6 A Yes. I have a secretary.

7 Q And at the time who was your secretary? And that is
8 -- when I say time, I mean the time-frame that you are refer-
9 ring to in paragraph 34 of your direct testimony.

10 A This would have been the first filing, I believe.

11 Q Who was your secretary?

12 A Judy Alsop.

13 Q Can you spell that?

14 A Judy Alsop. A L S A P -- oh, S O P, I guess it is.

15 A L S O P.

16 Q She was on Trinity Broadcasting Network's payroll.
17 Is that correct?

18 A Yes.

19 Q Was she on Translator TV, Inc.'s payroll?

20 A No. Translator didn't have any employees.

21 Q And -- does your secretary -- did your secretary
22 constitute your staff, the staff --

23 A Yes.

24 Q -- you were referring to?

25 A Yes.

1 Q And you say you also relied on an engineer and a
2 consulting engineer or was it one and the same?

3 A No, they were one and the same at that time.

4 Q At that time, who was the consulting engineer that
5 you were relying on?

6 A James Rieger (phonetic sp.).

7 Q Who was that?

8 A He was a -- an independent engineer.

9 Q He did work for Trinity Broadcasting Network?

10 A Yes.

11 Q Was he paid for his services in preparing Translator
12 TV, Inc.'s application?

13 A Yes.

14 Q Trinity Broadcasting Network paid him, isn't that
15 correct?

16 A Without looking at the record, I, I really don't
17 remember that far back whether --

18 Q Would Translator TV, Inc., pay him?

19 A I think that there was a record on the books that --
20 at least, that was my understanding at that time, that there
21 was a record on the books that Translator's expenses would be
22 allotted to Translator.

23 Q What books are you referring to?

24 A To the Accounting Department.

25 Q Trinity's Accounting --

1 A Yes.

2 Q -- Department? You personally visited sites for the

3 --

4 A No, I --

5 Q -- for the application?

6 A No. I would call on the telephone. That's, that's

7 how we would do it. We contact site owners through the tele-

8 phone and then we would communicate that way.

9 Q When you say "we" would contact, who else are you

10 referring to besides yourself?

11 A Jim Rieger.

12 Q You would have a conference call?

13 A Well, he would call and make the arrangements and I

14 would call and confirm and make sure everything was the way it

15 should be. I, I would be in communication with the site

16 owners as well usually.

17 Q And you said you also relied on Gammon and Grange in

18 the preparation of the application. Is --

19 A Yes.

20 Q -- that correct? Gammon and Grange were at the time

21 Trinity's lawyers. Is that correct?

22 A That's correct.

23 Q Who retained Gammon and Grange to act on behalf of

24 Translator TV, Inc.?

25 A I would indicate to them that this was -- they knew

1 it was Translator activity. Obviously they were aware of our
2 corporation and its separateness.

3 JUDGE CHACHKIN: Did you get a response to your
4 question? Your question was who, who authorized Gammon and
5 Grange to act on behalf of Translator TV. Was that your
6 question?

7 MR. SCHONMAN: Yes.

8 JUDGE CHACHKIN: I don't think that was -- your
9 answer was responsive to that question.

10 MRS. DUFF: Okay. I did.

11 BY MR. SCHONMAN:

12 Q Was Gammon and Grange paid for their services on
13 behalf of Translator TV, Inc., at that time?

14 A I think they did bill Translator separately and
15 that, that would -- I'm almost sure that they did.

16 Q Who, who paid Gammon and Grange?

17 A It would have been -- my understanding at that time
18 is that they were -- that the Accounting Department was desig-
19 nating Translator's expenses to Translator.

20 Q Trinity's Accounting Department, is that correct?

21 A Yes.

22 JUDGE CHACHKIN: But the expenses are actually being
23 paid at that time by Trinity?

24 MRS. DUFF: By Trinity, because Translator didn't
25 have its funds until such time as we had a telethon. There

1 was a telethon and Translator did have some of its own funds,
2 which was I think like \$31,000. So, Translator was able to
3 pay for the filing of those applications in the beginning.

4 BY MR. SCHONMAN:

5 Q Now, at this time Trinity Broadcasting Network was
6 filing applications. Is that correct?

7 A Trinity was filing for full-power applications, but
8 I, I don't think that Trinity filed for -- I could be mistak-
9 en. I don't think Trinity filed any low-power --

10 MR. SCHONMAN: Your Honor, can we go off the record
11 for a moment?

12 JUDGE CHACHKIN: Yes.

13 (Off the record.)

14 (On the record.)

15 JUDGE CHACHKIN: All right. Continue.

16 BY MR. SCHONMAN:

17 Q Mrs. Duff, I'd like to refer you to Bureau Exhibit
18 No. 28, specifically to page 8. You have -- do you have page
19 8 in front of you?

20 A Yes.

21 Q Does that help with -- refresh your recollection as
22 to what translator applications were filed by Trinity
23 companies?

24 A Yes, it does.

25 Q So, Trinity was filing applications at that time.

1 Is that correct?

2 A Yes, they were.

3 Q And Translator TV, Inc., was filing applications at
4 that time?

5 A Right. I don't -- I can't -- still don't have a
6 frame of reference for the actual time. Maybe -- I don't see
7 a date here.

8 Q Well, the file numbers --

9 A Oh, okay.

10 Q -- reflect the, the date that these applications
11 were filed. If only you notice, for example --

12 A Eighty --

13 Q -- Trinity Broadcasting of Seattle, Inc. What that
14 file number means is that it was filed on January 1, 19--
15 well, I'm sorry -- October 17, 1980. But you'll agree that,
16 that Trinity was filing applications at the same time that
17 Translator TV, Inc., was filing applications?

18 A Yes. It's been so long ago I'd forgotten.

19 Q And you were overseeing the preparation and filing
20 of applications for both companies, correct?

21 A Yes.

22 Q Can you tell me how it was determined, Mrs. Duff,
23 what communities TBN would apply for and what communities
24 Translator TV, Inc., would apply for?

25 A You know, honestly, the only -- I can only remember

1 what Translator was, was going to file for. That was -- the
2 majority of my interest was -- at that time, it just seemed
3 like my focus was on what Translator was going to file for
4 and, and that was capital cities, largest cities, and I had
5 earmarked a couple markets that I was interested in and David
6 Estima-- Espinoza had mentioned some areas that he was inter-
7 ested in. And --

8 Q Was, was it a toss-up? Trinity can choose one, T--
9 Translator TV, Inc., will choose? How was it decided? What
10 was the process?

11 A My, my focus was really on Translator. I don't
12 remember what we -- how we came about deciding what Trinity
13 was going to file for. I, I don't want to try to reconstruct
14 because I, I can't remember focusing on what Trinity was
15 doing. I, I had almost forgotten that Trinity had filed any.
16 So, my focus was really on what I was going to file for, for,
17 for Translator.

18 Q You were on the boards of both corporations at
19 this --

20 A Yes.

21 Q -- time, correct?

22 A Right.

23 Q And you were overseeing the filing of Trinity's
24 applications --

25 A I was.

1 Q -- correct? And you were overseeing the filing of
2 Translator TV, Inc.'s applications?

3 A I was.

4 Q And you can't recall how the communities were se-
5 lected?

6 A I remember very definitely how Translator's appli-
7 cations were selected, but I honestly do not remember much
8 about what TBN was, was filing for at that particular time. I
9 don't know. Maybe the Engineering Department was influencing
10 that. But I, I just really can't focus on --

11 Q Trinity's Engineering Department --

12 A Yes.

13 Q -- may have decided which communities --

14 A They may have. But I don't remember getting that
15 involved with the selection of -- at that time it was
16 International Panorama.

17 Q Mrs. Duff, on page 9 of Bureau Exhibit No. 28,
18 there's a reference -- item number 21, an application filed by
19 Translator TV, Inc., for a Houston translator?

20 A Yes.

21 Q Who decided to file for Houston?

22 A I decided to file for Houston. Basically, we were
23 looking for large-size markets. We were looking for markets
24 that would -- you know, like I said, capital cities. But it
25 boiled down to what frequencies were available and areas where

1 we could find a site that would work. And in the case of
2 Houston, we had to go for a 100-watter, which we preferred to
3 have 1,000 watts if we could get it. But, anyway, this --
4 that's -- I -- that's why I remember focusing on Houston. It
5 was one of the few that we filed that were 100 watts, and the
6 only one that we got granted, by the way.

7 Q Mrs. Duff, would you turn to Bureau Exhibit No. 15?
8 And that's a letter from Colby May to you at Trinity
9 Broadcasting Network's offices. Have you read that --

10 A Yes.

11 Q -- Mrs. Duff? There's a reference in the body of
12 this letter on page 1. It says, "Since Translator TV, Inc.,
13 will be appearing on KTBN TV's November telethon seeking
14 support from the public, it is important that proper record-
15 keeping procedures be implemented." Do you see that?

16 A Yes.

17 Q And my question is did Translator TV, Inc., in fact
18 appear on KTBN TV's November telethon?

19 A Yes.

20 Q KTBN is Trinity's flagship station in Los Angeles?

21 A That's correct.

22 Q After 1980 did Translator TV, Inc., ever appear on
23 any such telethons?

24 A Yes.

25 Q When?

1 A Not until much, much later, and the name was changed
2 to National Minority.

3 Q When was that?

4 A That was probably in connection with the Odessa
5 station once, once we got to the point where we thought we
6 were going to get the ownership of that station.

7 JUDGE CHACHKIN: Do you have any further on this
8 area before we take a recess?

9 MR. SCHONMAN: Yes, just a -- another question.

10 JUDGE CHACHKIN: Go ahead.

11 BY MR. SCHONMAN:

12 Q Do you recall receiving this letter from Colby May
13 shortly after November 10, 1980?

14 A I, I'm -- yes. After reading it, I think I read it
15 during my deposition and in our preparation. I had forgotten
16 about it, but I -- my memory was refreshed once I read the
17 letter.

18 Q So, you did-- you didn't read it in November 1980?

19 A Oh, yes, I did, but I -- when I first was questioned
20 about it I didn't remember. But after reading it, my memory
21 was refreshed.

22 MR. SCHONMAN: Thank you. We can take a break now.

23 JUDGE CHACHKIN: One, one question. Who made the
24 plea for funds on behalf of Translator TV, Inc., at this
25 telethon?

1 MRS. DUFF: I believe Mr. Crouch and I and David.

2 JUDGE CHACHKIN: David? You're sure David was there
3 in California?

4 MRS. DUFF: David Espinoza. He would have been a
5 participant in the, the telethons.

6 JUDGE CHACHKIN: Are you sure he was in California?

7 MRS. DUFF: I may be mistaken that -- there was a
8 time that we went to Florida. It may have been in Florida,
9 but I, I don't think so. I think we were in California.

10 JUDGE CHACHKIN: Well, this one says it was done in
11 California, this particular telethon was to be done in
12 California. KTBN is --

13 MRS. DUFF: Yeah.

14 JUDGE CHACHKIN: -- California, I assume?

15 MRS. DUFF: It would de-- me-- depend on the time.
16 It -- we probably were in California then, but David and I had
17 done telethons in Florida. I think this one was in
18 California.

19 JUDGE CHACHKIN: So, was it just Mr. Crouch and you
20 that made the plea for funds?

21 MRS. DUFF: No, I believe David was there too.

22 JUDGE CHACHKIN: You believe David was there too?

23 MRS. DUFF: I think he was.

24 JUDGE CHACHKIN: All right. We'll take a ten-minute
25 recess at this time.

1 (Whereupon, a brief recess ensued.)

2 JUDGE CHACHKIN: Back on the record. Continue, Mr.
3 Schonman.

4 MR. SCHONMAN: Mrs. Duff, would you kindly turn to
5 Bureau Exhibit No. 16, please?

6 MR. TOPEL: Excuse me. Mrs. Duff, did you want to
7 say something in --

8 MRS. DUFF: Yes.

9 MR. TOPEL: -- in res-- to --

10 MRS. DUFF: Could I --

11 MR. TOPEL: -- clarify your prior answer?

12 MRS. DUFF: Could I address Your Honor?

13 JUDGE CHACHKIN: Well, it's -- oh --

14 MR. TOPEL: It was in response to the question --

15 JUDGE CHACHKIN: Oh, yes.

16 MR. TOPEL: And, and I would --

17 JUDGE CHACHKIN: About who, who were the ones who
18 made the plea for --

19 MR. TOPEL: Yes.

20 JUDGE CHACHKIN: -- funds at that telethon? Yes.

21 MRS. DUFF: Right.

22 JUDGE CHACHKIN: Go ahead.

23 MRS. DUFF: I just wanted you to know that I don't
24 have an absolute memory of David being there. I just -- I, I
25 think he was, but I'm not absolutely positive. I wanted you

1 to know that for sure, that I --

2 JUDGE CHACHKIN: All right. Thank you. Go ahead,
3 Mr. Schonman.

4 BY MR. SCHONMAN:

5 Q Bureau Exhibit 16, if you would kindly turn to that?
6 And I'd like to direct your attention specifically to pages 1
7 and then page 9. Have you read this, Mrs. Duff?

8 A Yes.

9 Q Initially, I'd like to ask you do you, do you know
10 why Mr. Juggert directed this letter, which involves
11 Translator TV matters, but directed the letter to, to Trinity
12 Broadcasting Network?

13 A Well, he referenced to Translator TV. I, I'm assum-
14 ing he knew that --

15 JUDGE CHACHKIN: Well, I think that, that, that
16 would be strictly speculation. Why don't you ask Mr. Juggert
17 when he's a witness?

18 MR. SCHONMAN: We can do that, Your Honor.

19 JUDGE CHACHKIN: Since he wrote the letter. She
20 can't speculate what's in his mind.

21 BY MR. SCHONMAN:

22 Q Mrs. Duff, you'll see on, on page 9 there is a Power
23 of Attorney. Do you have that before you?

24 A Yes.

25 Q Was there any Board action by Translator TV, Inc.,

1 regarding this Power of Attorney?

2 A I don't remember. I might have been familiar with
3 this, but I don't have a recollection of it, no.

4 Q Do you know why this was done, that is, naming
5 Norman Juggert -- giving him Power of Attorney?

6 A The only thing I would do is just read it and, and
7 just speculate like anybody else. I -- because I don't have a
8 recollection of it. I don't know what was going on at that
9 particular time. I would just have to read it and take it on
10 its face.

11 Q I understand. Do you know if similar powers of
12 attorney were granted by Trinity's other stations, that is,
13 Trinity of Florida?

14 A I'm not familiar with any.

15 Q With any at all?

16 A No. With, with -- I'm not familiar with any power
17 of attorneys that were done for any of the stations.

18 Q Would you turn to Bureau Exhibit No. 17, please?
19 And that's a cover letter and an application for Translator
20 TV, Inc.'s applications for Crestline, California. Do you
21 know who prepared this application?

22 A Generally speaking, during those early days my
23 secretary would type parts of the application and Gammon and
24 Grange would insertin-- would insert from their word processor
25 some of the exhibits that we would provide them the

1 information for. And then, of course, the -- any engineering
2 exhibit -- I don't think this one -- I don't see an
3 engineering exhibit.

4 Q On page 7 of this application, Mr. Juggert is iden-
5 tified as Secretary and a Board member. As of November 1980,
6 was Mr. Juggert a Secretary and a Board member of Translator
7 TV, Inc.?

8 A That's an error. He was never Secretary or Board
9 member of Translator. I don't know how that error occurred.

10 Q At the time this application was filed with the
11 Commission, was Mr. Espinoza Chief Financial Officer of
12 Translator TV, Inc.?

13 A What was the date of this?

14 Q November 1980.

15 A I believe that -- whatever the, the Minutes reflect,
16 going back to the Minutes. I can't keep everything in my
17 head.

18 Q Well, I, I can represent to you that the Minutes
19 will reflect that he was CFO of Translator TV, Inc.

20 A Well, this -- that's not correct either.

21 Q Do you know why that -- there's that omission in
22 this application?

23 A I have no idea.

24 Q Did you review this application before it was filed?

25 A I reviewed all the applications. There was a lot

1 going on at that particular time and I just probably made some
2 errors.

3 Q What else was going on at that time?

4 A I had full responsibility for all these applica-
5 tions, which we were -- being filed all at one time, plus all
6 my other responsible -- responsibilities for TBN as Public
7 Affairs Director, and I think at that time I was doing a
8 program, Public Affairs program, which I was fully responsible
9 for and various and sundry other things. We were still deal-
10 ing with Saddleback and I was very busy at that particular
11 time.

12 Q Now, on page 7 it identifies you as Vice President
13 and a Board member. You were also Secretary, weren't you?

14 A Yes.

15 Q Do you know why there was that omission in this
16 application?

17 A The only thing is I, I probably desig-- delegated
18 this to a secretary to, to fill it out or -- I would only have
19 to reconstruct -- I have no idea how those errors occurred.

20 JUDGE CHACHKIN: If you would look at page 6, para-
21 graph seven, the statement made that, "the applicant Trinity
22 share three common officers and directors." You say that's
23 not correct?

24 MRS. DUFF: Actually, David was not a Director of
25 Trinity Broadcasting.

1 JUDGE CHACHKIN: But Mr. Juggert you said was not a
2 Director of --

3 MRS. DUFF: No, Dav--

4 JUDGE CHACHKIN: -- Translator -- or was he?

5 MRS. DUFF: No. No. Mr. Juggert was never a
6 Director of Trans--

7 JUDGE CHACHKIN: So, this -- so, this statement was
8 not correct then?

9 MRS. DUFF: No, that one wasn't correct either.
10 Boy, we did a lousy job of that.

11 BY MR. SCHONMAN:

12 Q Now, I notice from page 4 that Mr. Rieger was a
13 consulting engineer with respect to this application. Is that
14 correct?

15 A Yes.

16 Q Who paid Mr. Rieger for the services with regard to
17 the Crestline application?

18 A I don't have an exact memory of it. I would just --
19 I, I believe that Translator -- it was -- the expenses were
20 allocated to Translator by Trinity's Accounting Department.

21 Q Is your answer then that Trinity paid Mr. Rieger?

22 A I believe that, that Translator actually did, be-
23 cause we did have the telethon and we did have funds and I
24 believe that there -- at that time that we did charge -- that
25 we were charged, that, that Translator was charged for the

1 expenses.

2 Q Mrs. Duff, at page 37 of your deposition on -- taken
3 on October 7, 1993, there's a discussion about Mr. Rieger.

4 The question: "Would you identify James L. Rieger?"

5 Answer: "He was the engineer, a contract engineer."

6 Question: "And did he also provide engineering services for

7 TBN?" Answer: "Yes." Question: "And who paid Mr. Rieger?"

8 Answer: "I'm sure TBN would have paid him."

9 A Well, in the context of the question, I think --
10 didn't you reference -- does -- isn't he Trinity's engineer?
11 And I would have, of course, said yes, Trinity pays him for
12 Trinity's work.

13 Q This discussion I believe is referring to the
14 Crestline application.

15 A Well, maybe I was confused.

16 Q Would you turn to Bureau Exhibit No. 18, please?

17 JUDGE CHACKIN: Do you know that, that -- Exhibit
18 17, was it? -- in the back of it contains the official posi-
19 tions held by Ms. Duff and Mr. Juggert in 1979?

20 MR. COHEN: Where is that, Your Honor? What, what
21 are you referring to?

22 JUDGE CHACKIN: I'm referring to the application,
23 bottom of your page 9. There's a listing of the officers and
24 directorships held by Ms. Duff and Mr. Juggert and Mr. Crouch.
25 All right. What next exhibit do you want the witness to look

1 at?

2 MR. SCHONMAN: Number 18.

3 JUDGE CHACHKIN: Eighteen.

4 BY MR. SCHONMAN:

5 Q Mrs. Duff, do you know at whose direction this
6 document was prepared?

7 A Under whose direction?

8 Q Yes. At whose direction.

9 A Oh, I would have requested Mr. Phipps to prepare
10 this. I believe it was in conjunction with the filing of the
11 applications. I would have asked him for this type of
12 projection.

13 Q Why did you ask him to prepare it?

14 A Oh, I'm not sure. The time -- I would just have to,
15 to guess that it was in connection with filing for the appli-
16 cations for the translators for Translator.

17 Q In the first paragraph, there's the reference, "It
18 is anticipated that within the next three-year period approxi-
19 mately 100 translator sites will be erected at an average cost
20 of \$125,000 each for an expenditure of \$12,500,000." Do you
21 see that?

22 A Yes.

23 Q That reference refers to translators filed by TBN
24 and Translator TV, Inc., doesn't it? Combined?

25 A I really don't -- I -- I'm not sure whether it does

1 or not.

2 Q Would Translator TV, Inc., have filed 100 translator
3 applications?

4 A Well, obviously nobody filed that many applications
5 all together, I don't believe. This is just a projection that
6 he was making, I believe. I --

7 Q Well, did Translator TV, Inc., have any plans to
8 file that many applications?

9 A You said there wasn't any limit. We didn't have --
10 there wasn't -- that's why he was trying to see how much money
11 we had planned to spend over the years. I, I don't really
12 know why he did this the way he did it. I don't have an
13 answer for that.

14 JUDGE CHACHKIN: This was for internal use? This
15 wasn't filed with any --

16 MRS. DUFF: No. No.

17 JUDGE CHACHKIN: -- outside body, was it?

18 MRS. DUFF: No, I don't think it was. It, it's not
19 in the form that would have been useful for an application.

20 JUDGE CHACHKIN: Someone must have requested that he
21 prepare a -- such a projection. You have no recollection who
22 was -- who, who --

23 MRS. DUFF: I don't --

24 JUDGE CHACHKIN: -- was the one who asked him to
25 prepare this projection --

1 MRS. DUFF: I don't remember if I did or if I
2 didn't. I may have, but I, I don't have a real memory of it.

3 JUDGE CHACHKIN: All right.

4 BY MR. SCHONMAN:

5 Q Would you turn to Bureau Exhibit No. 19, please?
6 And that's an interoffice memorandum from Bill Phipps to Betty
7 Smith. Is that right?

8 A Yes.

9 Q Who is Debbie Smith?

10 A At that time she was the head of the Computer
11 Department.

12 Q TBN's Computer Department?

13 A Yes.

14 Q Now, this refers to the telethon that was conducted
15 in November 1980, is that correct?

16 A Yes.

17 Q Mrs. Duff, the, the first sentence states, "During
18 the telethon we solicited for special funds over the airways
19 for satellitor/translator stations." Do you see that?

20 A Yes.

21 Q My question for you is during this telethon were
22 funds solicited over the air for translator stations generally
23 or for Translator TV, Inc., specifically?

24 A I believe that they were specifically raised for
25 Translator TV, and then there may have been some other

1 solicitations for, for TBN for satellite stations because at
2 that particular time I believe that they did have applications
3 on file as well.

4 Q But this memorandum doesn't differentiate between
5 funds solicited for TBN as opposed to funds solicited for
6 Translator TV, Inc., does it?

7 A No, it doesn't. So, I -- since I didn't write the
8 memo, I, I don't know.

9 Q You received a copy of it, didn't you?

10 A I did receive a copy of it, I'm sure, but I don't --
11 I didn't remember it in -- I really don't remember receiving
12 it. I'm sure I did. But I think that at this particular time
13 Mr. Phipps was confused and the results of the way he set up
14 this new designation code, I believe that this was the begin-
15 ning of the error that resulted in the accounting error that
16 wasn't actually discovered until -- and corrected until 1987.
17 I believe this was its inception right here.

18 Q When you noticed this confusion on the part of Mr.
19 Phipps, did you, did you bring it to his attention?

20 A Well --

21 MR. TOPEL: I, I, I'm not sure the witness testified
22 that she noticed the confusion, if the question is referencing
23 to 1980. I believe the witness indicated that she had no
24 recollection.

25 MR. SCHONMAN: I think --